

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

RECEIVED

FEB 24 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of:

Administration of the  
North American Numbering Plan

CC Docket No. 92-237  
Phase I

Reply Comments of Allnet Communication Services

Allnet Communication Services, Inc. (Allnet), hereby replies to the comments filed in the above captioned proceeding.

The Comments are virtually unanimous. Due to obvious conflicts of interest, Bellcore should not continue in its present role of administering the numbering plan.<sup>1</sup>

Almost all parties urge the commission to take a more pro-active role in numbering plan issues. The Commission should assume the formal role as the NANP policy maker and, if necessary, contract out the ministerial role of carrying out those policies.

Finally, the recent announcement of Ameritech regarding its proposal to "open up" the local network,<sup>2</sup> demonstrates how imperative it is that the Commission begin a proceeding regarding how all telephone numbers should

---

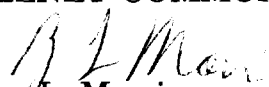
<sup>1</sup>See, for example, Comments of McCaw, MCI, BellSouth, and Allnet.

<sup>2</sup>In its press conference on February 22, 1993, Ameritech's officers indicated that all telephone numbers will be portable under its "Universal Access Plan." It also indicated that the plan would be implemented by 1994. The plan recognizes that a significant component of the monopoly power of a local exchange carrier is in its monopoly control on a customer's telephone number. Analogously, the Commission found a similar problem with 800 numbers prior to 800 data base. See, CC Docket No. 86-10.

become portable, and not geographic specific.<sup>3</sup>

In conclusion, it is clear that time is running out. It is necessary for the Commission to take more of a pro-active role and not wait for the industry to reach a consensus by osmosis. With Ameritech's deadline of 1994, it is imperative that the Commission begin a rulemaking proceeding to require all telephone numbers to become portable without any further delay.

Respectfully submitted,  
ALLNET COMMUNICATION SERVICES, INC

  
Roy L. Morris  
Deputy General Counsel  
1990 M Street, NW, Suite 500  
Washington, D.C. 20036  
(202) 293-0593


Dated: February 24, 1993

---

<sup>3</sup>Telephone number portability requires only a central registry of telephone numbers and the corresponding users. For determining routing, interexchange carrier could either query a centralized database to determine how a call should be routed (using the technology of 800 data base) or employ a "broadcast" data network method of polling networks to determine upon which network a portable number terminates. Customers could go from local exchange carrier to local exchange carrier without changing their numbers.

### Certificate of Service

I, Angela Slaughter, hereby certify that I have caused to be served on this date, February 24, 1993 a true copy of the forgoing Allnet Reply by postage-prepaid first class mail to the parties on the attached service list.



February 24, 1993

Cheryl Tritt  
Federal Communications  
Commission  
1919 M Street, NW, Rm. 500  
Washington, DC 20554

F. Keene & L. Peck  
Ameritech  
2000 W Ameritech Ctr Dr  
Hoffman Est, IL 60196-1025

T. Frank & V. McCann  
Arent Fox, Kintner, Plotkin  
1050 Connecticut Ave., NW  
Washington, D.C. 20036

Berry, Rosenblum, Lewis  
AT&T  
295 N. Maple Ave. #3244J1  
Basking Ridge, NJ 07920

Michael Slorin  
Bell Communications Rsch.  
290 West Mt. Pleasant Ave.  
Livingston, NJ 07039

W. Barfield & T. Rawls, II  
BellSouth Telephone Cos.  
1155 Peachtree St. NE #1800  
Atlanta, GA 30367-6000

A.A. Kurtze  
Centel Corporation  
9725 Higgins Road  
Chicago, Ill. 60631

Peyton Wynns, Chief, IAD  
Common Carrier Bureau FCC  
1919 M Street, NW, Ste. 538  
Washington, D.C. 20554

John Cimko, Chief, MSD  
Common Carrier Bureau FCC  
1919 M Street, NW, Rm. 644  
Washington, D.C. 20554

Mary Green  
Common Carrier Bureau FCC  
1919 M Street, Rm. 538  
Washington, D.C. 20554

Downtown Copy Center  
1114 21st Street, N.W.  
Washington, D.C. 20036

Cheryl Tritt  
FCC  
1919 M Street, NW, Ste. 500  
Washington, D.C. 20554

William E. Wyrrough, Jr.  
Florida Public Svc. Comm.  
101 E. Gaines Street  
Tallahassee, FL 32399-0850

Daniel L. Bart  
GTE Service Corporation  
1850 M St., NW, Ste. 1200  
Washington, D.C. 20036

M. Hamilton & M. Olch  
McGraw Cellular Comm.  
5400 Carillon Point  
Kirkland, Wash. 98033

Carol Schultz  
MCI Communications Corp  
1801 Pennsylvania Ave, N.W.  
Washington, D.C. 20006

Cindy Z. Schonhaut  
Metropolitan Fiber Systems  
3000 K Street, NW, Ste. 300  
Washington, D.C. 20007

Paul Rodgers  
NARUC  
1102 ICC Bldg. - POB 684  
Washington, D.C. 20044

D. Cosson & L. Guillory  
National Tele. Coop. Assoc.  
2626 Penn. Avenue, NW  
Washington, D.C. 20037

M. McDermott & C. Ayling  
NYNEX  
120 Bloomingdale Road  
White Plains, NY 10605

Stanley J. Moore  
Pacific Bell and Nevada Bell  
1275 Pennsylvania Ave., N.W.  
Washington, D.C. 20004

J. Tutill & N. Woolf  
Pacific Bell and Nevada Bell  
140 New Montgomery St.  
San Francisco, Calif. 94105

Avery, Wolfe & Davenport  
PSC of Dist. of Columbia  
450 5th Street, NW  
Washington, D.C. 20001

Josephine Trubek  
Rochester Tele. Corporation  
180 S. Clinton Avenue  
Rochester, NY 14646

A. Richard Metzger, Jr.  
Rogers & Wells  
1737 H Street, N.W.  
Washington, DC 20006-3922

William A. Mason  
Rogers Cantel Inc.  
10 York Mills Road  
North York, Ontario M2P2C9,

Dupre, Hartgrove & Walters  
Southwestern Bell Tele. Co.  
1010 Pine St., Rm. 2114  
St. Louis, MO 63101

A. Lipman & R. Blau  
Swidler & Berlin  
3000 K Street, NW #300  
Washington, D.C 20007

R. C. Atkinson  
Teleport Communications  
One Teleport Drive #301  
Staten Island, NY 10311

W. Richard Morris  
United Telecommunications  
Post Office Box 11315  
Kansas City, MO 64112

J. Keithley & L. Kestenbaum  
United Tele. System Cos.  
1850 M Street, NW #1100  
Washington, DC. 20036

Allan G. Duncan  
Unitel Communications  
200 Wellington Street, West  
Toronto, Ontario M5V3C7 Canada

L. Sarjeant, J. Hannon  
US West  
1020 19th Street, NW #700  
Washington, D.C. 20036

M. McCue, VP & Gen. Counsel  
USTA  
900 19th Street, NW #800  
Washington, D.C. 20006-2105

R. Senkowski & J. Linder  
Wiley, Rein & Fielding  
1776 K Street, N.W.  
Washington, D.C. 20006

Senkowski, Linder & Katz  
Wiley, Rein & Fielding  
1776 K Street, NW  
Washington, D.C. 20006